

FILED

IN THE EASTERN DISTRICT OF THE UNITED STATES
AT GREENEVILLE, TENNESSEE

JUN 15 12 04 PM '06

U.S. DISTRICT COURT
EASTERN DISTRICT OF TENN.
CLERK

Lisa L. Thornburgh

Case No. 2:06-cv-81

Plaintiff

v.

Central Intelligence Agency,
Yahoo! Inc.

701 First Avenue
Sunnyvale, CA 94089

Tel: (408) 349-3300

Fax: (408) 349-3301

Defendant

MOTION TO

~~ORDER~~ **COMPEL ~~THE~~ PRODUCTION OF ELECTRONIC DOCUMENTS**

1. Plaintiff requests the Court order YAHOO! to produce any and all electronic documents, to include emails, ISP sources, server addresses and sources where email was opened and/or accessed, correspondence related to accessing the listed accounts pertaining to the following hotmail and Yahoo! email accounts for Lisa L. Thornburgh, between the dates of May 2004 and June 2006 to the date of the request of this Order.

“Any party may serve on any other party a request (1) to produce and permit the party making the request, or someone acting on the requestor's behalf, to inspect and copy, any designated documents (including writings, drawings, graphs, charts, photographs, phonorecords, and other data compilations from which information can be obtained, translated, if necessary, by the respondent through detection devices into reasonably usable form), or to inspect and copy, test, or sample any tangible things which constitute or contain matters within the scope of Rule 26(b) and which are in the possession, custody or control of the party upon whom the request is served.”

3. Plaintiff requests that the above-enumerated items related to the following YAHOO! account(s) for Lisa L. Thornburgh, to include any and all Instant

Messaging ("IM") mail and/or correspondence (to include any and all attachments):

any and all correspondence related to the ID lthor04@yahoo.com, and/or any similar derivation and/or listing under Lisa L. Thornburgh, between the dates of May 2004 until June 2006.

elithor03@yahoo.com

4. Pursuant to FRCP 26(b) which states, in part the following:

"Parties may obtain discovery regarding any matter, not privileged, that is relevant to the claim or defense of any party, including the existence, description, nature, custody, condition, and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of any discoverable matter. For good cause, the court may order discovery of any matter relevant to the subject matter involved in the action. Relevant information need not be admissible at the trial if the discovery appears reasonably calculated to lead to the discovery of admissible evidence." (including Instant Messaging)

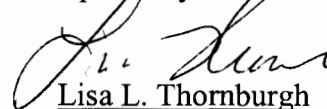
→ to specifically include any and ^{all} correspondence between *JBouRES@yahoo.com* ~~and~~ *JB@yahoo.com* ~~and~~ *GEDMATSUI@yahoo.com* ~~and~~ *Lisa Thornburgh's yahoo.com account.*

As stated in the Complaint, docket number Plaintiff has suffered ongoing email disruption/obstruction with email and has corresponded with Defendant(s) named *and Lisa Thornburgh's yahoo.com account.* in the Complaint using the YAHOO! email address and Instant Messaging ("IM") services.

For the above-cited reasons, Plaintiff requests the immediate relief:

1. Immediate disclosure of any and all email records to contain any and all attachments, ISP sources, etc. related to Lisa L. Thornburgh's YAHOO! account between the dates of May 2004 until June 2006 to Lisa L. Thornburgh, 234 Circle Drive # 2, Greeneville, Tennessee 37745.
2. That the Court order the Defendant to bear the costs of reproduction and copying of email correspondence and ISP sources.
3. Reasonable attorney's fees.
4. Any other relief the Court deems just.

Respectfully submitted,


Lisa L. Thornburgh

Pro Se
234 Circle Drive # 2
Greeneville, Tennessee
37745

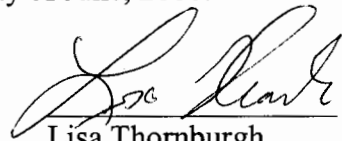
Certificate of Service

I hereby certify that a true and correct copy of the foregoing pleading was served on the following persons:

1. **Office of Legal Counsel
Yahoo! Inc.
701 First Avenue
Sunnyvale, CA 94089
Tel: (408) 349-3300
Fax: (408) 349-3301**

2. **Office of General Counsel
Central Intelligence Agency
Washington, D.C. 20505**

By depositing same in the United States mail this 16th day of June, 2006.

A handwritten signature in black ink, appearing to read 'Lisa Thornburgh', is written over a horizontal line.

Lisa Thornburgh,
Pro Se Plaintiff
Greeneville, TN 37745

This 16th day of June, 2006.